

Remedium

December 10, 2008

Director Remedium Group, Inc. A Subsidiary of W. R. Grace & Co.

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U.S. Environmental Protection Agency **EPR-SR** 1595 Wynkoop Street Denver, CO 80202

Attn.:

Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site

Monthly Progress Report - November 2008

Dear Bonnie:

This progress report describes work completed during the month of November 2008, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

MWH

A. ACTIONS TAKEN

The following is a summary of the actions taken and progress made during the month of November.

Element 4 continuous precipitation and flow monitoring at stations LRC -06, LRC-02 and CC-02 was terminated on November 12 and the ISCO samplers were removed from OU3 for winter storage. No rain storms sufficient to cause discernable increased flows at these stations occurred during November, thus no storm-event samples were collected.

B. SAMPLING RESULTS

Through November 2008, LA analytical results and re-issued, lab-corrected LA analytical reports for Phase I samples have continued to be issued by the analytical laboratory. Results for Phase IIA, Element 1 surface water and sediment samples and Element 2 and Element 3 surface water samples for LA analyses continued to be issued by the analytical laboratory throughout November 2008.

PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

Prepare the Field Sampling Summary Report for Phase II.

Participate in teleconferences and meetings as requested by EPA.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

None.

Parametrix

The following is a summary of the actions taken and progress made during the month of November for Phase II C activities.

A. ACTIONS TAKEN

- Completed in-house equipment demobilization activities from Libby aquatic sampling.
- Finished uploading remaining field sampling data sheets (FSDS), Chain of Custody, habitat and fish data forms to EPA data base.
- Entered habitat data into Parametrix data files.
- Participated on conference calls with EPA and USFWS regarding Rainbow Trout (RBT) water samples with low Libby amphiboles concentrations.
- Delayed initial start of Hyalella test pending review of modified sediment toxicity protocols by EPA (more bugs ordered for delayed test).
- Modified sediment toxicity test protocols for review by EPA.
- Participated on conference calls with EPA and USFWS regarding modifications to sediment bioassay procedures (Hyalella only) to evaluate the potential for loss of Libby amphiboles during test exposure.
- Initiated sediment toxicity tests for Hyalella azteca on November 12, 2008 per revised protocol.
- Initiated sediment toxicity tests for Chironomis tentans per protocol on November 12, 2008.
- Shipped 20 sediment pore water samples to EMSL on November 13, 2008 for analysis of Libby amphiboles.
- Shipped four water samples associated with RBT test to EMSL on November 17, 2008 for further analysis of Libby amphiboles.

B. SAMPLING RESULTS

None yet.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

Receive macroinvertebrate data from Aquatic Associates.

- Receive fish histopathology data from Oregon State University.
- Upload macroinvertebrate community and fish population data to Parametrix data base.
- Upload sediment chemistry data to Parametrix data base.
- Initiate fish population and macroinvertebrate community evaluations.
- Conclude toxicity tests (Hyalella, Chironomid).
- Initiate preparation of draft data report for 2008 fish and macroinvertebrate work.
- Prepare initial draft report for surface water rainbow trout water toxicity test.
- Prepare initial draft report for sediment invertebrate toxicity test.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

- Protocol deviation with Hyalella sediment toxicity test. The amount of food provided during the test on day s 2, 3, 4 and 5 was 1/10th of the amount specified in the protocol. Discussed with EPA. Resolution: continue the test with proper feeding regime.
- Sediment toxicity test pore water sampling: Only 20 of 28 samples were able to be collected because there was not enough pore water to collect in two of the treatments.

If you have any questions regarding this progress report, please call Bob Marriam at (901) 820-2023.

Sincerely,

Robert J. Medler **Project Coordinator**

Remedium Group, Inc.

Robert Press

CC: Michael DeDen - MWH

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